

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

L.A., a legally incapacitated Minor, by and
through his Conservator, LINDA
BOBRIN-PLOTKIN, and
KIERSTEN REESER, KIERSTEN
REESER, Individually, JEREMY
ARMSTRONG, Individually,

Plaintiffs,

Case No: 21-12050

vs.

Hon. Robert H. Cleland
Mag. David R. Grand

UNITED STATES OF AMERICA, and
W.A. FOOTE MEMORIAL HOSPITAL a/k/a
HENRY FORD ALLEGIANCE HEALTH, and
CHARLES EDWARD ROLLISON, D.O., and
RONALD NICHOLS, M.D., and
ALMA GARLO, M.D.,

Defendants.

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**DEFENDANTS, CHARLES EDWARD ROLLISON, D.O. AND ALMA GARLO, M.D.'S,
CONCURRENCE REGARDING ARGUMENTS RAISED AND LEGAL AUTHORITY
CITED IN RESPONSE BRIEFS FILED BY CO-DEFENDANTS, HENRY FORD
ALLEGIANCE HEALTH [57] AND UNITED STATES OF AMERICA [58]
IN RESPONSE TO PLAINTIFFS' MOTION TO COMPEL PRODUCTION
OF PEER REVIEW MATERIALS [53]**

NOW COME Defendants, CHARLES EDWARD ROLLISON, D.O., and ALMA GARLO, M.D., by and through their attorneys, KITCH, DRUTCHAS, WAGNER, VALITUTTI & SHERBROOK, and hereby concur in the requested relief set forth in Co-Defendants, HENRY FORD ALLEGIANCE HEALTH, and UNITED STATES OF AMERICA'S Response briefs in opposition to Plaintiffs' Motion to Compel Production of Peer Review Materials, for the reasons set forth in Co-Defendants' Response Briefs [ECF 57 and ECF 58], and hereby incorporate by reference, and rely upon the arguments and/or legal authorities cited within the above response briefs in support of the requested relief that Plaintiffs' Motion to Compel Production of Peer Review Materials be denied.

Respectfully submitted,

KITCH, DRUTCHAS, WAGNER, VALITUTTI &
SHERBROOK

By: /s/ Ralph F. Valitutti

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Dated: February 10, 2023

CERTIFICATE OF SERVICE

I, Janice Franco, hereby certify that I am employed with the firm of KITCH DRUTCHAS WAGNER VALITUTTI & SHERBROOK, and that on February 10, 2023, I personally caused to be served the within with the Clerk of the Court using the ECF system which will send email notification of such filing to all attorneys of record. I declare that the statements above are true to the best of information, knowledge and belief.

/s/ Janice Franco

Janice Franco